UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

In re: BAIR HUGGER FORCED AIR WARMING DEVICES PRODUCTS LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

DEFENDANTS' MEET AND CONFER STATEMENT REGARDING MOTION TO DISMISS FOR LACK OF SUBJECT-MATTER JURISDICTION

The undersigned counsel for Defendants 3M Company and Arizant Healthcare Inc. ("Defendants") states that the meet-and-confer requirements of Local Rule 7.1(a)(1)(A) have been satisfied. Plaintiffs' counsel in *Hylander* (16-cv-02518) confirmed they will oppose the Motion. Defendants sent several emails to Plaintiffs' counsel for the other matters, inquiring whether Plaintiffs would stipulate to dismissal. Counsel did not respond to any of those emails, including a final email on June 6, 2018, advising of the imminent filing of the Motion in the absence of an agreement.

Dated: June 13, 2018 Respectfully submitted,

s/Benjamin W. Hulse

Benjamin W. Hulse (MN #0390952) Attorney for Defendants 3M Company and Arizant Healthcare Inc.

BLACKWELL BURKE P.A. 431 South Seventh Street, Suite 2500

Minneapolis, MN 55415 Phone: (612) 343-3200

Fax: (612) 343-3205

Email: bhulse@blackwellburke.com